



VIRGINIA  
& AMBINDER LLP  
A t t o r n e y s   a t   L a w

Application GRANTED. Further extension requests are unlikely to be granted. The Clerk of Court is directed to terminate ECF No. 17.

40 Broad Street, 7<sup>th</sup> Floor  
New York, New York 10004  
Telephone: (212) 943-9080

**Maura Moosnick, Esq.**  
Partner  
[mmoosnick@vandallp.com](mailto:mmoosnick@vandallp.com)

SO ORDERED.

February 6, 2025

February 6, 2025

**VIA ECF**

Hon. Jesse M. Furman, U.S.D.J.  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**RE:** *Trustees of the New York City District Council of Carpenters Pension Fund, et al., v. Sunny Acres Landscaping Inc. 24-CV-8117 (JMF)*

Dear Judge Furman:

This firm represents the Petitioners in the above-referenced action. We write to submit a request for a 45-day extension in connection with the Court's December 9, 2024 Order (ECF Doc. No. 8) which, *inter alia*, required the Respondent in this case to file their opposition by February 10, 2025. The Petitioners' reply, if any, is due on February 17, 2025. This is the third such request.

The parties have engaged in settlement discussions relating to Respondent's audit compliance, and Respondent has produced limited records for a payroll audit to be performed, subject to trustee approval. On February 4, 2025, the auditors produced a preliminary report based upon the limited records provided, but have advised that additional records may be required.

In light of the parties' settlement discussions and development of a potential resolution (subject to review of the preliminary report by the Respondent, production of additional records if needed, and trustee approval), the Respondent respectfully requests an additional 45-day extension of the briefing schedule in this matter, with Respondent's opposition to be due on March 27, 2025 and the Petitioners' reply to be due on April 3, 2025. This request is submitted by the undersigned as a professional courtesy because Respondent only has retained counsel that is admitted to practice law in Maryland. The Petitioners do not object to this request by the Respondent.

We thank the Court for its time and attention to this matter, and we sincerely appreciate the Court's courtesies and consideration.

Very truly yours,

Maura Moosnick, Esq.

cc: Timothy Talbot, Esq. (via Electronic Mail)